

Exhibit W

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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008 HO

**DEFENDANT'S FOURTH
AMENDED POTENTIAL EXHIBIT
LIST**

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar and Federal Public Defender Steven T. Wax, hereby submits the following Fourth Amended List of Potential Exhibits.

Trial Ex. #	Exhibit Description
0601	Constitution of Al Haramain Islamic Foundation (Saudi Arabia)
0602	Monthly report and statement of purpose (PF)
0602(A)	Monthly Report and Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation March 6, 1998
0602(B)	Signed Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation
0602(C)	Statement of Purpose and Declaration of Cooperation between Qu'ran Foundation and Al Haramain Islamic Foundation with printed signatures Solimon Al Buthe, Abu Unus, Dawood Rodgers, and Robert L. Brown
0603	Letter March 31, 1998, Qu'ran Foundation to Al Haramain Foundation
0604-0605	Reserved
0606	Email January 1, 2000, 2:37 p.m. P to Al Buthe
0607	Photograph Pete Seda and Solomon Al Buthe under tree
0608	Photograph Pete Seda, Rob Brown, John Dunn and David Rodgers
0609	Photograph including Rob Brown, David Rodgers, and Pete Seda

- 0610 Photograph of 3800 S Highway 99 with camel
- 0611 Photograph of cultural tent at 3800 South Highway 99
- 0612 Photograph Al Haramain building
- 0613 Photograph of David Rodgers with King Abdullah
- 0614 Email June 26, 2000 AQ to b@qf.org on his trip - and extremism
- 0614(A) Attachment to June 26 2000 email June 25, 2000 Al Buthe to AQ
- 0615-0627 Reserved
- 0628 December 2, 1999, article from NY TIMES "McCain Urges Ending Aid To Russia In Wake Of Chechen Policy"
- 0629 ABC News.com page, December 9, 1999, "Yeltsin Lashes Out"
- 0630 THE INDEPENDENT web page December 11, 1999, "In A Powerless, Frozen City Of No Food, The Blind Hear The Bombs And Know There Is No Escape; Sarah Richards Toured Chechnya's Capital As Russian Forces Closed In, And Was Among The Last To Leave." **[replaced with different version]**
- 0631 TIME webpage December 13, 1999, "Campaign 2000: Foreign Policy: Where McCain Hits Bush The Hardest"
- 0632 Doctors Without Borders webpage December 15, 1999, "Chechnya: The Tracking of Civilians"
- 0633 CNN.com webpage December 16, 1999, "Albright Delivering 'strong message' to Russia"
- 0634 Email December 29, 1999 at 5:20 a.m., Raya Shokatfard to 1z@qf.org, with CNN.com webpage December 18, 1999, "Russian Bombardment Intensifies As Troops Close On Grozny" **[replaced with a complete version]**

- 0635 Webpage The Gazette, February 6, 2000, "Escape From Chechnya" **[replaced with different version]**
- 0636 Reserved
- 0637 Email February 17, 2000 at 1:02 a.m., Q to AQ with CNN webpage February 16, 2000, "NATO, Russian Relax Tense Relations" **[replaced with a complete version]**
- 0638 Reserved
- 0639 Article Ria Novosti February 28, 2000, "Saudi Arabia to Provide Humanitarian Aid For Refugees"
- 0640 Human Rights Watch Report February 29, 2000, "War Crimes In Chechnya And The Response Of The West"
- 0641 Email February 21, 2000 at 11:34 p.m. The Arborist to b at qf.org with CNN.com February 21, 2000 Russia Chechnya webpage **[replaced with a complete version]**
- 0642 CNN.com Website Pages March 22-31, 2000
- 0643 UN Commission on Human Rights Resolution of April 25, 2000
- 0643(A) United Nations Foundation U.N. wire April 26, 2000, "U.N. Seeks Inquiry Into Violations In Chechnya"
- 0644 MSF-USA special report, November 22, 2000, Chechnya, The Politics Of Terror
- 0645 United Nations High Commissioner for Human Rights Resolution 2001/24
- 0646 U.S. Senate Committee on Foreign Relations, Joseph R. Biden, February 12, 2004
- 0647 State Department Russia Country Report 1999
- 0648 State Department Russia Country Report 2000

- 0649 State Department Russia Country Report 2001
- 0650 NY Times 10/30/99 "Fears Rise for Chechen Refugees as Winter Nears"
- 0651 Reserved
- 0652 Congressional Research Service Report for Congress: Chechnya Conflict: Recent developments (May 3, 2000)
- 0653 News article U.S.: Chechen Officials Hold Talks at State Department (February 2, 2000)
- 0654 Time.com News Article, Why Russia May Keep Chechen Capital in Ruins (February 7, 2000)
- 0656-0663 Reserved
- 0664 Email September 18, 2001 from Florin to Pete Seda plus attachment
- 0664(A) September 21, 2001, 9:25 a.m. P to Council of American Islamic Relations plus attachment
- 0665 Email September 21, 2001, 9:33 a.m. P to CIC@cicnow.com
- 0666 - 0667 Reserved
- 0668 Bank of America Check and traveler's check purchase
- 0669 Email January 11, 2000, 14:38:08 S. El Fiki to Haramain
- 0670 Email January 18, 2000, Haramain to S. El Fiki
- 0671 Email February 21, 2000, 9:12 a.m. head office to S. El Fiki
- 0672 February 21, 2000, Letter Aqeel to S. El Fiki
- 0673 February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait

- 0673(A) English translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
- 0673(B) Declaration of Translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
- 0674 Email February 24, 2000 P to Al Buthe RE money transferred
- 0675 Reserved
- 0676 Email March 27, 2000, 8:36 a.m. Al Haramain to S. El Fiki
- 0677 Letter April 13, 2000, Mahmoud T. El Fiki from National Bank of Kuwait
- 0678 Redacted Federal Bureau of Investigation 302 interview report of Mahmoud Talaat El Fiki, investigation on January 31, 2005
- 0679 Kuwait Bank record for El Fiki
- 0680 Email May 11, 1999 Barhoush to Haramain et al Subject: Urgent Albanian Translation
- 0680(A) Email Abdul Qadir to Haramain May 11, 1999 Report of Committee on Albania
- 0681 Email December 11, 1999, Abdul Qadir to Qur'an and Sunnah Net Group; Jeddah-Net@muslimsonline.com
- 0682 Email December 28, 1999, 4:26 p.m. from Info to Info@irw.org
- 0683 Email December 30, 1999, 8:50 p.m. P to Al Buthe
- 0683(A) Attachment to email Statement in Spanish and English from Ayuda Internacional Al Desplazado
- 0683(B) Email from Al Buthe to P December 31, 1999 Human Help for Chechnya

- 0683(C) Email January 1, 2000 1:46 P to Al Buthe RE Horrible Condition
- 0683(D) Email from Al Buthe to P, January 2, 2000 at 4:58 AM
- 0684 Email from Head Office to Bilal Ibrahim with cc to Pete, January 3, 2000 at 3:10 AM
- 0685 Email from Abdul-Qaadir to q@qf.org, January 4, 2000 at 1:00 AM
- 0685(A) Email attachment January 4, 2000 at 1:00 AM
- 0686 Email January 6, 2000, 1:35 a.m. Al Buthe to P
- 0686(A) Email January 6, 2000, 1:37 a.m. Al Buthe to P
- 0686(B) Email January 7, 2000, 3:48 p.m. Info to Info@irw.org
- 0686(C) Email January 12, 2000, 5:43 p.m. Info to Info@irw.org
- 0687 Email Daveed Gartenstein-Ross to P January 17, 2000
- 0687(A) Email P to Daveed Gartenstein-Ross January 17, 2000
- 0687(B) Email Chain P to B February 21, 2000, including Daveed Gartenstein-Ross to P 1/17/2000 RE Horrible Condition and P to Al Buthe 1/1/2000 RE Horrible Condition
- 0687(C) Email P to Daveed Gartenstein-Ross January 18, 2000 plus attachment
- 0687(D) Email P to Daveed Gartenstein-Ross January 18, 2000
- 0688 Email Ashland to Al Buthe January 18, 2000
- 0688(A) Email January 22, 2000, 11:23 p.m. Ashland to Al Buthe
- 0689 Letter January 24, 2000, Pete Seda to Responsible Secretariat of Federation Committee for International Technical Humanitarian Cooperation

- 0689(A) Email January 27, 2000, 10:08 a.m. Info to Info@irw.org
- 0690 Email AQ to Sheeshan February 3, 2000
- 0691 Email P to Daveed Gartenstein-Ross February 4, 2000
- 0691(A) Email P to Daveed Gartenstein-Ross February 8, 2000
- 0692 Email Q to AQ February 12, 2000
- 0692(A) Email from Q to Sunnah, February 12, 2000, with path to Time.com, Photo Essay RE: Grozny
- 0692(B) Photographs Time.com photo essay, Russian Soldiers Rest in Downtown Grozny
- 0692(C) Blinded and Bound, Chechen Civilians
- 0692(D) Chechen Men in Pit
- 0692(E) Chechen Boy in Cellar
- 0692(F) Chechen Woman with Son
- 0692(G) Fallen City
- 0693 Email P to Al Buthe February 15, 2000
- 0693(A) Email The Arborist to Al Buthe February 17, 2000
- 0693(B) Email P to B February 19, 2000
- 0693(C) Email P to Al Haramain February 20, 2000
- 0694 Email February 20, 2000 The Arborist to b@qf.org
- 0694(A) Email P to MCA February 21, 2000 11:40
- 0694(B) Email February 21, 2000, 11:34 p.m. from The Arborist to B@qf.org

- 0694(C) Email February 21, 2000, 10:54 a.m. The Arborist to B@qf.org
- 0694(D) Email February 21, 2000 5:48 p.m. The Arborist to B
[replaced with different version]
- 0694(E) Web page Medecins Sans Frontieres
- 0694(F) Web page United Nations
- 0695 Email Chain P to B February 21, 2000 including P to Daveed Gartenstein-Ross 2/19/2000 and Daveed Gartenstein-Ross to P 2/8/2000 RE: Chechnya
- 0696 Email AQ to Sheeshaan February 23, 2000
- 0697 Email February 29, 2000, 12:16 p.m. P to B@qf.org
- 0697(A) Email Q to PJFlorin February 29, 2000
- 0697(B) Email P to B March 1, 2000
- 0698 Memorandum March 1, 2000, Catherine Granel from Bilal Abdul-Kareem, "Aid to the People of Chechnya"
- 0698(A) Email Q to Granel March 1, 2000 with Memo to Bilal
- 0698(B) Web Page Doctors of the World Staff 2000
- 0698(C) Email March 1, 2000, 10:55 a.m. Q to P@qf.org
- 0698(D) Email March 1, 2000, 11:29 a.m. P to PJFlorin@jeffnet.org
- 0698(E) Letter March 1, 2000 Bilal to Catherine Granel RE: Aid to the people of Chechnya
- 0698(F) Email March 1, 2000 P to Q RE: Letter to Doctors
- 0698(G) Letter Attachment to March 1, 2000 email Subject: Aid to the People of Chechnya
- 0698(H) Email Q to The Arborist March 3, 2000

- 0699 Email P to Al Buthe March 3, 2000
- 0699(A) Email March 4, 2000 p to q@qf.org
- 0699(B) Attachment to Email March 4, 2000
- 0700 Email March 5, 2000 P to b@qf.org FW: I need your help!
- 700(A) Web printout, World Food Program, Azerbaijan, printed February 29, 2000
- 700(B) Web printout, World Food Program Delivers - The Balkans, printed February 29, 2000
- 700(C) Web printout, World Food Program Bread Story - Kosovo, printed February 29, 2000
- 700(D) Web printout, World Food Program Logistics Photo Gallery, picture of airplane dropping food, printed March 1, 2000
- 700(E) Web printout, World Food Program Logistics Photo Gallery, picture of helicopter, printed March 1, 2000
- 700(F) Web printout, World Food Program Logistics Photo Gallery, picture of truck convoy, printed March 1, 2000
- 700(G) Web printout, World Food Program Logistics Photo Gallery, picture of loaded truck, printed March 1, 2000
- 0701 Email March 15, 2000 from Info to Harith RE Eid Mubarak
- 0701(A) April 2, 2001, 9:58 a.m. CIC@cicnow.com
- 0702 - 0703 Reserved
- 0704(A) Al Haramain Islamic Foundation receipt No. 262740
- 0704(B) English translation of Al Haramain Islamic Foundation receipt No. 262740
- 0705(A) Al Haramain receipt no. 263867

- 0705(B) English translation of Al Haramain receipt no. 263867
- 0706(A) Al Haramain log page of receipts no. 262740 & 263867
- 0706(B) English translation of Al Haramain log page of receipts no. 262740 & 263867
- 0707(A) Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
- 0707(B) Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
- 0707(C) English translation of Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
- 0708 - 0712 Reserved
- 0713 Al Suwailem Declaration
- 0714(A) Diwan Presidency of Counsel of Ministers
- 0714(B) English translation of Diwan Presidency of Counsel of Ministers
- 0715(A) Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
- 0715(B) English translation of Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
- 0716(A) Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
- 0716(B) English translation of Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
- 0717(A) Memo to His Excellency Minister of Finance and National Economy

- 0717(B) English translation of Memo to His Excellency Minister of Finance and National Economy
- 0718(A) Order of King Fahad Bin Abdulaziz Al-Saud
- 0718(B) English translation of Order of King Fahad Bin Abdulaziz Al-Saud
- 0719(A) Al Haramain Humanitarian Foundation memorandum November 4, 1999
- 0719(B) English translation of Al Haramain Humanitarian Foundation memorandum November 4, 1999
- 0720(A) Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
- 0720(B) English translation of Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
- 0721(A) Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
- 0721(B) English translation of Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
- 0722(A) Memo from Al Haramain Charity Foundation January 4, 2000
- 0722(B) English translation of memo from Al Haramain Charity Foundation January 4, 2000
- 0723(A) Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
- 0723(B) English translation of Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
- 0724(A) Brief report what Chechnya Committee has achieved abroad

- 0724(B) English translation of brief report what Chechnya Committee has achieved abroad
- 0725(A) Declaration of Vladimir Matusevitch August 23, 2004
- 0725(B) Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya in Russian and Arabic
- 0725(C) English translation from Arabic of Memo of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
- 0725(D) English translation from Russian of Russian and Arabic language version of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
- 0725(E) Russian language version of Certificate 9927 of the State Registration Chamber
- 0725(F) English translation of Certificate 9927 of the State Registration Chamber
- 0726(A) Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
- 0726(B) English translation of Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
- 0727(A) Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004
- 0727(B) English translation of Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004
- 0728(A) Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
- 0728(B) English translation of Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
- 0729(A) Statement from Al Haramain Charity Foundation May 3, 2004

- 0729(B) English translation of Statement from Al Haramain Charity Foundation May 3, 2004
- 0730 Unclassified summary regarding monies destined for needy Chechen families
- 0731 Al Haramain Website list of Al Haramain bank accounts
- 0732 - 0747 Reserved
- 0748 Handwritten document captioned "Wire Transfer" top line \$2767
- 0749(A) Email December 30, 1999 8:20 a.m. Tom to Pete Seda
- 0749(B) Proposal attachment to email: Letter Tom Wilcox to Pete Seda December 30, 1999
- 0750 Engagement letter from Tom Wilcox to Pete Seda
- 0751 Handwritten list, top line 2/24/2000 Mahmoud T. El Fiki
- 0752 Check #9733 June 23, 2000
- 0753 Check #9733 6/23/2000
- 754.42318 2000 Form 990
- 754.42335 2000 State CT-12 Return
- 754.42477 2001 Form 990
- 754.42494 2001 State CT-12 Return
- 754.42532 Letter from Internal Revenue Service to Al Haramain dated September 2, 2002
- 754.42533 Letter from Internal Revenue Service to Al Haramain dated February 20, 2002
- 754.42540 Letter from OR DOJ to Al Haramain dated October 30, 2001

- 754.42659 Letter from OR DOJ to Al Haramain dated June 19, 2001
- 754.42703 Letter from OR Dept of Revenue to Al Haramain dated August 8, 2000
- 754.42810 Letter from Internal Revenue Service to Al Haramain dated May 31, 2002
- 754.42895 Letter from OR DOJ to Al Haramain dated February 22, 2001
- 754.42896 1999 Form 990
- 754.43005 1998 Corporate Return Form 1120
- 754.43014 Oregon Corporation excise tax return 1998
- 754.43075 Letter from Internal Revenue Service to Al Haramain dated December 7, 2000
- 754.43104 Letter from Internal Revenue Service to Al Haramain dated October 13, 2000
- 754.43111 Letter from Tom Wilcox to OR DOJ dated September 22, 2000
- 754.43112 Letter from OR DOJ to Al Haramain dated September 7, 2000
- 754.43127 Letter from Tom Wilcox to Internal Revenue Service dated September 25, 2000
- 754.43129 Letter from Internal Revenue Service to Al Haramain dated September 6, 2000
- 754.43156 Letter from Tom Wilcox to Internal Revenue Service dated August 17, 2000
- 754.43158 Letter from Internal Revenue Service to Al Haramain dated March 24, 2000
- 754.43193 1023 Application

- 754.43219 Letter from OR DOJ to Al Haramain dated January 14, 2004
- 754.43220 Letter from Internal Revenue Service to Al Haramain dated February 9, 2004
- 754.43238 Letter from Internal Revenue Service to Al Haramain dated March 16, 2000
- 754.43252 Letter from OR DOJ to Al Haramain dated July 26, 2000
- 754.43257 Letter from OR DOJ to Al Haramain dated April 11, 2000
- 754.43337 Letter from Internal Revenue Service to Al Haramain dated December 22, 2003
- 754.43340 Letter from OR DOJ to Al Haramain dated November 21, 2003
- 754.43341 Letter from OR DOJ to Al Haramain dated October 16, 2003
- 754.43356 Letter from OR DOJ to Al Haramain dated June 4, 2003
- 754.43360 Letter from OR DOJ to Al Haramain dated April 4, 2001
- 754.43411 Letter from OR DOJ to Al Haramain dated October 30, 2000
- 754.43433 Letter from Tom Wilcox to Internal Revenue Service dated January 3, 2002
- 754.43434 Letter from Internal Revenue Service to Al Haramain dated December 31, 2001
- 754.43437 Letter from Tom Wilcox to Internal Revenue Service dated October 2, 2001
- 754.43438 Letter from Internal Revenue Service to Al Haramain dated September 24, 2001
- 754.43447 Letter from OR DOJ to Al Haramain dated August 24, 2001

- 754.43459 1999 State CT-12 Return
- 754.43462 Letter from Tom Wilcox to OR DOJ dated January 8, 2001
- 754.43487 Letter from Internal Revenue Service to Al Haramain dated February 4, 2000
- 754.43512 Letter from Internal Revenue Service to Al Haramain dated June 1, 2000
- 754.43660 Letter from Internal Revenue Service to Al Haramain dated April 18, 2001
- 755.1 Email from P to Tom Wilcox, May 14, 2001
- 755.2 Attachment to 755.1 - QuickBooks File
- 755.3 Floppy Disk from Tom Wilcox, Labeled "Al Haramain 6/14/2001"
- 755.4 QuickBooks file located on 755.3
- 755.5 Email January 7, 2002 from Tom Wilcox to P
- 755.6 Attachment to 755.5 - QuickBooks File
- 755.7 Jeff Cone, Audit Trail, January 1999 through December 2003 **[first page has been redacted]**
- 755.8 Jeff Cone, Financial Statement Transactions: QuickBooks Audit Report Emulation
- 755.9 Email March 13, 2001 from Tom Wilcox to Pete Sedda
- 755.10 Attachment to 755.9 - QuickBooks File
- 755.11 Email June 12, 2001 from P to Shoumar, Abdulaziz S (rrd)
- 755.12 Attachment to 755.11 - QuickBooks File
- 755.13 September 19 - 24 Wilcox Data Entry Report

- 0756 Email January 2, 2000, 1:13 p.m. P to Ms. Katkhouda
- 0757-0758 Reserved
- 0759 Email February 26, 2000, 12:45 a.m. from Al Buthe to P@qf.org
- 0760 Email March 6, 2000 Al Shoumar to q@qf.org
- 0760(A) Attachment to Email March 6, 2000 Al Shoumar to q@qf.org
- 0761 Email from Q to P March 7, 2000, Six months budget with attachment
- 0762 Email from P to Shoumar January 3, 2001 RE springfield@Al Haramain.org
- 0763-0800 Reserved
- 0801 Email April 1, 2000, 3:07 p.m. P to Raya Shokatford
- 0802 Letter Proposal April 11, 2000, Pete Seda
- 0803(A) Email April 12, 2000, 11:57 a.m. PJFlorin@jeffnet.org to Pete Seda
- 0803(B) Draft greetings letter.doc attached to email
- 0803(C) Draft public relations letter re Islam attached to email
- 0803(D) Draft Greeting Letter (PF)
- 0803(E) Draft greeting letter (short version) PF
- 0803(F) Letter April 11, 2000 Public relation plan (PF)
- 0804(A) Email April 18, 2000, 3:05 p.m. PJFlorin @jeffnet.org to Pete Seda
- 0804(B) Draft Jewish Community letter attached

- 0804(C) Draft anti-terrorism letter to Sheik Aqeel attached to April 11, 2000, email
- 0804(D) Letter to April 18, 2000 to Rabbi Zaslow (PF)
- 0804(E) Letter April 18, 2000 to Rabbi Sirinski (PF)
- 0805(A) Email April 19, 2000 12:46 a.m. Ashland to Al Buthe
- 0805(B) Attachment to email, Letter April 19, 2000, Pete Seda to Aqeel al Aqeel
- 0806 Letter April 19, 2000, Pete Seda to Aqeel al Aqeel
- 0807 Email July 5, 2000, 11:52 a.m. PJFlorin@jeffnet.org to Pete Seda plus attachment
- 0807(A) Draft letter to Shiukh (PF)
- 0808 ASHLAND DAILY TIDINGS September 15, 2001
- 0809 Letter September 18, 2001, Al Haramain Foundation, signed by Pete Seda, to Office of Emergency Relief, City of New York
- 0809(A) Letter September 18, 2001 to NYC (PF)
- 0810 Letter September 18, 2001, Pete Seda to State Department
- 0810(A) Draft September 2001 Justice for All (PF)
- 0810(B) Draft September 2001 Justice for All (PF)
- 0811 Letter September 18, 2001, Pete Seda to Office of Emergency Relief
- 0812 Letter September 20, 2001, Pete Seda to My Dear Brothers and Sisters, Call for Islamic Outreach
- 0812(A) Call For Islamic Outreach (PF)
- 0813 Letter to State Department 9/18/2001 (PF)

- 0813(A) Letter September 20, 2001, Secretary of Health and Human Services, Tommy Thompson, from Pete Seda
- 0814 Mail Tribune article, September 20, 2001
- 0815 Letter to the Editor by Pete Seda
- 0815(A) Press Release "From The Muslim Heart" (PF)
- 0816 Email September 21, 2001, 9:15 p.m. Marisa Petersen to Qur'an Foundation
- 0817 Email September 23, 2001, 10:59 a.m. A to letters@tucsoncitizen.com
- 0818 Email September 23, 2001, 6:45 p.m. A to Oelrichs@rockymountainnews.com
- 0819 Email September 23, 2001, 7:31 p.m. A to letters@washpost.com
- 0820(A) Email September 26, 2001, 11:04 a.m. Florin to Pete Seda
- 0820(B) Letter September 26, 2001, Pete Seda to Senator Wyden
- 0820(C) Letter Form: Educational Outreach Services (PF)
- 0821 Letter October 2, 2001, Congressman Greg Walden to Pete Seda
- 0822 Letter October 2, 2001, Pete Seda to Dear Spiritual Leader
- 0823 Letter October 5, 2001, Federal Bureau of Investigation Thomas J. Pickard to Pete Seda
- 0824 Email October 7, 2001, 2:28 p.m. The Arborist to Traci Dow
- 0825 Email October 7, 2001, 3:05 p.m. A to DBerger and attachment

- 0826 Email October 14, 2001, 1:16 p.m. Scarlet Ledesma to Pete@TheArborist.com
- 0827 Reserved
- 0828 Letter October 24, 2001, Department of the Army, Office of Chief of Chaplins, to Pete Seda
- 0829 Letter November 19, 2001, Federal Bureau of Investigation to Pete Seda
- 0830 Email November 27, 2001 2:57 pm, from Peace Hhouse to recipient list
- 0831 Email November 28, 2001 7:58 am, Victoria Lane to P
- 0832 Announcement of community benefit concert Saturday, December 1, 2001
- 0833 Press release March 2002
- 0833(A) Press Release - Six Month Anniversary of 9/11 (PF)
- 0834 Email Pete Seda To Pat Florin, March 12, 2002 Al Haramain Press Release (PF) **[replaced with different document]**
- 0835 Letter March 15, 2002, Pete Seda to Senator Joseph Biden
- 0835(A) Letter To Biden, March 14, 2002 (PF)
- 0836(A) Email October 14, 2002, from Florin to Pete Seda
- 0836(B) Attachment to Email October 14, 2002, from Florin to Pete Seda
- 0836(C) Letter To Scholars Of The Ummah (PF)
- 0837 Reserved
- 0838 Letter November 4, 2002, Pete Seda to Brothers in Al Haramain Islamic Foundation

- 0839 Letter 10th of Sha'ban 1423 Pete Seda to Scholars of the Ummah
- 0840 Memo January 28, 2003, Secretary of State Powell from Pete Seda
- 0840(A) Letter January 28, 2003 from Pete Seda to Charles Matthews seeking Fatwah on Bin Laden
- 0840(B) Letter To Colin Powell, January 27, 2003 (PF)
- 0840(C) Letter January 28, 2003 Pete Seda to David Carroll RE Islamic legal case against Osama Bin Laden
- 0841 - 0852 Reserved
- 0853 Letter February 14, 2002, United States Department of Justice, Criminal Division, to Pete Seda
- 0854 Letter July 2, 2002, Pete Seda to Dave Carroll
- 0855 Consent 10/3/01 for David Carroll to access Al Haramain Bank Account
- 0856 Photograph Pete Seda with United States UAE Ambassador Michele J. Sison
- 0857 - 0865 Reserved
- 0866 Letter April 22, 2002, Pete Seda to Israeli Embassy
- 0866(A) Email Pat Florin To Pete Seda, Re: Letter re Palestinian Aid (PF), plus attachment
- 0867 Letter April 22, 2002, Pete Seda to Licensing Division, Office of Foreign Assets Control
- 0868(A) Email April 22, 2002, P to Florin 4:43 pm
- 0868(B) Attached letter to Israeli Embassy April 22, 2002
- 0869 Email April 23, 2002 8:19 am, Brett Schor to P

- 0870 Letter May 2, 2002, Ambassador Kurtzer to Pete Seda
- 0871 Emails May 13, 2002, P.S to Benny Dagan
- 0872 Letter May 14, 2002, Pete Seda to Lorraine Lanlor, Office of Foreign Assets Control
- 0873 Letter May 14, 2002, Pete Seda to Compliance Division Office of Foreign Assets Control
- 0873(A) Letter To Office of Foreign Assets Control, Re: Humanitarian Aid For Palestinians (PF)
- 0874(A) Email May 28, 2002, 1:25 pm P.S to Florin
- 0874(B) Letter May 28, 2002, Pete Seda to Earl Wall; attachment to May 28, 2002 letter
- 0874(C) Letter To Earl Wall, CARE, May 28, 2002 (PF)
- 0875 Letter June 19, 2002, Office of Foreign Assets Control to Martin McMahon, Esquire
- 0875(A) Email Pat Florin to P.S, June 20, 2002, Benny Dagan (PF)
- 0876 Letter July 1, 2002, Pete Seda to Richard Newcomb, Office of Foreign Assets Control
- 0877(A) Email July 2, 2002, 2:10 pm David Berger to Pete Seda
- 0877(B) Letter July 2, 2002, Pete Seda to Police Chief Scott Fleuter
- 0877(C) Letter July 2, 2002, to Lieutenant Patten
- 0878 Letter July 16, 2002, Pete Seda to Israeli Colonel Isaac Gurvich
- 0879 Letter July 17, 2002, Pete Seda to Ambassador Kurtzer
- 0880 Letter July 17, 2002, Pete Seda to United States Embassy, Economics Section, Ava Rogers

- 0881 Letter July 17, 2002, Pete Seda to Deborah Schwartz, United States Embassy, Israel
- 0882 Fax July 22, 2002, Ava Rogers, U.S. Embassy to Pete Seda
- 0882(A) Email Pete Seda to Pat Florin, July 22, 2003 With Ava Rogers.jpg (PF)
- 0882(B) Attachment to Ex 882(A), "7 22 02 Ava Rogers.jpg" (PF)
- 0883(A) Email July 22, 2002, Florin to P.S 11:24 am
- 0883(B) Letter July 22, 2002, Pete Seda to Ava Rogers, U.S. Embassy
- 0883(C) Letter July 22, 2002 Pete Seda to Ava Rogers United States Embassy Re: Humanitarian Aid in the West Bank and Gaza (PF)
- 0884 Letter July 23, 2002, Pete Seda to Ian Barukh, Israeli Foreign Ministry
- 0885 Letter July 26, 2002, Rabbi Zaslow
- 0886(A) Email July 30, 2002, P.S. to David Berger 2:28 p.m.
[replaced with different document]
- 0886(B) Letter Israeli government July 28, 2002
- 0887 Fax July 31, 2002, Leah Tsemel to Pete Seda
- 0888 Letter Pete Seda to Ms. Orley, Israel Defense Forces
- 0889 Email August 27, 2002, Florin to P.S, with email from P.S to Florin
- 0890 Stained Peace of My Heart Aug 2002 (PF)
- 0891 - 0905 Reserved
- 0906 Email February 21, 2000, 8:50 p.m. wsra99@aol.com to P@qf.org

- 0907 Email March 29, 2000, 11:32 a.m. P to wsra99@aol.com
- 0907(A) Email March 30, 2000 P to Al Buthe FW: Agreement
- 0907(B) Email March 30, 2000 P to Al Buthe FW: Agreement with attachment
- 0908(A) Email October 26, 2001, 4:48 p.m. Sandra Kay to Pete Seda
- 0908(B) Attached letter, October 26, 2001, to Steve Monroe at Office of Foreign Assets Control
- 0909(A) Letter November 1, 2001, Pete Seda to Emily Clay at Office of Foreign Assets Control
- 0909(B) Letter November 2, 2001, Office of Foreign Assets Control to Pete Seda
- 0909(C) Letter November 1, 2001 Pete Seda to Emily Clay Office of Foreign Assets Control Application for license to distribute food to Afghani refugees (PF)
- 0910 Email October 9, 2000 P to Al Buthe RE; Tajikistan
- 0911 Email October 23, 2001 P to Al Buthe RE make it work out - with attachments
- 0912 - 0924 Reserved
- 0925 Photograph Pete Seda with truck
- 0926 Article REGISTER GUARD, "Fate of Big Leaf Maples in Whiteaker Up In The Air"
- 0927 Email January 20, 2000, 7:41 p.m. Brad and Rooney Riggs to P
- 0928 Email February 11, 2000, 6:56 p.m. Jim Hartman to Pete Seda
- 0929 Ashland Watershed Partnership meeting notes March 28, 2000

- 0930 Email November 17, 2000, 3:08 p.m.: Swales to @mind.net
- 0931 Email April 11, 2001, 11:56 a.m. Rose Hill to P@qf.org
- 0932 Email June 24, 2001, 2:13 p.m. The Arborist to Colonel Swales
- 0933(A) Email October 17, 2001, Representative Greg Walden to Pete Seda
- 0933(B) Email December 6, 2001, Representative Greg Walden to Pete Seda
- 0934 Photograph Pete Seda Cleaning Ashland
- 0935 Photograph Pete Seda On Ladder
- 0936 Photograph Pete Seda Cleaning with fire people
- 0937 Photograph The Arborist Crew
- 0938 Photograph Pete Seda with Governor Kitzhaber
- 0939 Photograph Pete Seda Cleaning Downtown Ashland
- 0940-0941 Reserved
- 0942 Letter To Mayor Cathy Shaw, January 31, 2000 (PF)
- 0943 Reserved
- 0944 Hamrick Road Letter, April 20, 2000 (PF)
- 0945 Reserved
- 0946 8/8/00 Letter to William Keller (PF)
- 0947-0955 Reserved
- 0956 Photograph Pete Seda with children
- 0957(A) Email March 28, 2000, 3:25 p.m. Q to P@qf.org

- 0957(B) March 28, 2000 letter Pete Seda to Pastor
- 0958 Email May 23, 2000, 3:20 p.m. B to P
- 0959 Email October 22, 2000, 8:57 p.m. Kelly Bennett to Pete Seda Sedaghaty
- 0960 Email January 24, 2001, 12:13 a.m. P to Shalomrav@aol.com
- 0961 Email February 23, 2001, 1:56 p.m. Stan Way to P@qf.org
- 0962 Email May 11, 2001, 10:12 a.m. James Y. Horton to P@qf.org
- 0963 Email May 21, 2001, 2:22 p.m. Pam Long to P@qf.org
- 0964 Email May 22, 2001, 11:31 a.m. Peace House to Pete Seda et. al.
- 0965 Email July 02, 2001, 12:53 a.m. Pete Seda to BLJ_maj@yahoo.com
- 0966 Photograph Class at Al Haramain [replaced with a complete version]
- 0967 Photograph class at tent
- 0968 Photograph multi-cultural fair
- 0969 Photograph Religion Class at tent
- 0970 Photograph presentation at church
- 0971 Email Jane Claussen to P at QF.org, January 2, 2002
- 0972(A) Email January 21, 2002, 1:50 pm, P to Florin
- 0972(B) Attachment letter for Peace House

- 0973 Bi-line article: Islamic Show Intrigues RCC, February 2002
- 0974 Email February 1, 2002, Drake, Tommy to P at QF.org, 10:47 am
- 0975 Email February 5, 2002, Closter, Larry to Q.
- 0976 Photograph Pete Seda In Church
- 0977 Photograph of Pete Seda lecturing to students
- 0978 Photograph Pete Seda in Rabbi Zaslow's Temple
- 0979-0986 Reserved
- 0987 Email April 11, 2000, 8:13 a.m. B to P@qf.org
- 0988 Email March 13, 2002, Stan Way to P
- 0989(A) Email April 19, 2002, P to Florin
- 0989(B) Attached letter to Senators and Reps
- 0990 Booklet Islam Is by Pete Seda
- 0991 Islamic T-Shirt
- 0992 - 1001 Reserved
- 1002 Pete Seda Video Statistics
- 1002(A) Pete Seda Video compilation CD
- 1002(B) Chechnya video compilation CD
- 1003 Summary of prisoner letters (to be created)
- 1004 Letter and Check \$300 November 15, 1999
- 1005 Check \$50 November 20, 1999
- 1006 Check \$100.00 November 20, 1999

- 1007 Check \$100.00 December 1, 1999
- 1008 Money order \$300 December 6, 1999
- 1009 Check \$400.00 December 20, 1999
- 1010 Check \$200.00 January 1, 2000
- 1011 Check and Envelope \$600.00 January 5, 2000
- 1012 Check \$150.00 January 19, 2000
- 1013 Check \$68.00 January 22, 2000
- 1014 Checks \$50,000.00, \$4,000.00, \$196.75 January 21, 2000
- 1015 Check and Deposit ticket February 23, 2000
- 1016 Check dated December 24, 1999, \$2,000.00
- 1017 - 1023 Reserved
- 1024 Photograph of Shrubbery
- 1025(A) Photograph of wire
- 1025(B) Photograph of wire
- 1026 Photograph of former President George W. Bush with Saudi Crown Prince Abdullah
- 1027 Copies of Receipt No. 418933 and Receipt No. 15881 written in Arabic
- 1028 Video report concerning activities of Al Haramain Medical Committee from 1999 (to be submitted under separate cover)
- 1028(A) 2 Minute Video Summary of 1028

- 1029 Patricia Florin document list
- 1030 Chase Bank deposit ticket dated March 25, 2000
- 1031 Chechnya donations
- 1032 - 1033 Reserved
- 1034 Photograph of interior of trailer searched
- 1035 - 1046 Reserved
- 1047 Photograph of interior of trailer searched, specifically depicting a box of "Pete's . . . tapes."
- 1048 -1053 Reserved
- 1054 Letter from Donald Stine, Chaplain, to Qu'ran Foundation, December 7, 1999
- 1055 Letter from Chaplain Denis K. Burrell to Alharamain Islamic Foundation, February 24, 2000
- 1056 Letter from Donald Stine, Chaplain, to Qu'ran Foundation, March 23, 2000
- 1057 Letter from Andrew Leatherman, Chaplain, to Al Haramain Foundation, July 19, 2000
- 1058 Email from Sgt. Vito D. Deure, U.S. Army Chaplain, to haramain@alharamain.org July 27, 2000
- 1059 Letter from Robert Thomas, Chaplain, to Al Haramain Islamic Foundation, August 1, 2000
- 1060 Letter from James E. Penn, Chaplain, to Quran Foundation, August 15, 2000

- 1061 Letter from Rev. Steve Gadaire, Chaplain, to Al Haramain Foundation USA, August 16, 2000
- 1062 Letter from Mitch Anderson, Chaplain, to Al Haramain Foundation, February 21, 2001
- 1063 Letter from Joe T. Portugal, Chaplain, to Al Haramain Foundation, April 9, 2002
- 1064 Demonstrative Exhibit of QuickBooks Activity
- 1065 Springfield Building Schedule per Jeff Cone
- 1201 Email from WesternSom to a@qf.org, February 9, 1999 at 9:13 p.m.
- 1201(A) Urgent Appeal Kosova, April 2, 1999, faxed to Al Haramain on April 2, 1999
- 1201(B) Time Sheet of Mr. Gartenstein-Ross for April 1999
- 1201(E) "Give Five Minutes For Kosova," Kosova Task Force, USA, Justice for All
- 1201(F) Check written to Kosova Task Force, USA, dated April 2, 1999
- 1210 Email Exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, May 4th and 5th, 1999
- 1215 Request for Assistance from the Uma Women Society, dated December 23, 1999
- 1216 Email exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, March 5, 2000
- 1238 Excerpt of Wilcox Working Papers Presented During Testimony
- 1238(A) Check \$21,000 #9624

1238(B) Check \$131,300 #9456
1238(C) Check \$10,000 #9002
1238(D) Check \$318,291.74 #9733
1238(E) Reconciliation Report

Respectfully submitted on September 7, 2010.

/s/ Steven T. Wax

Steven T. Wax
Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar